

25CR 036-V

***IN THE DISTRICT COURT OF THE UNITED STATES***  
***for the Western District of New York***

**March 2024 GRAND JURY**  
**(Impaneled 03/22/2024)**

**THE UNITED STATES OF AMERICA**

**-VS-**

**INDICTMENT**

**WINNIE TARU WOODS**

**a/k/a Ru**

(Counts 1-2),

**SHARRON MCCULLOUGH**

**a/k/a Black**

(Counts 1-2),

**MARLON HOLT, JR.**

**a/k/a Scooter**

**a/k/a Professor**

(Counts 1-2),

**GARY SUDESH GOSINE, SR.**

(Count 1)

**SHANNELL GOSINE**

(Count 1)

**Violations:**

Title 21, United States Code, Sections  
841(a)(1) and 846;

Title 18, United States Code, Section 2  
(2 Counts and 1 Forfeiture Allegation)

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WESTERN DISTRICT OF NEW YORK

FEB 20 2025

BY: 

**COUNT 1**

**(Conspiracy to Possess with Intent to Distribute, and to Distribute, 5 Kilograms or More  
of Cocaine, 50 Grams or More of Methamphetamine, and Fentanyl)**

**The Grand Jury Charges That:**

Beginning in or about April 2023, the exact date being unknown to the Grand Jury,  
and continuing until the return of the Indictment, in the Western District of New York, and  
elsewhere, the defendants, **WINNIE TARU WOODS a/k/a Ru, SHARRON**

MCCULLOUGH a/k/a Black, MARLON HOLT, JR. a/k/a Scooter a/k/a Professor, [REDACTED] GARY SUDESH GOSINE, SR., [REDACTED], and SHANNELL GOSINE, did knowingly and willfully combine, conspire, and agree together and with others, known and unknown to the Grand Jury, to commit the following offenses, that is, to possess with intent to distribute, and to distribute, 5 kilograms or more of a mixture and substance containing cocaine, 50 grams or more of methamphetamine, and a quantity of fentanyl, all Schedule II controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 841(b)(1)(C).

**All in violation of Title 21, United States Code, Section 846.**

**COUNT 2**

**(Possession of 5 Kilograms or More of Cocaine and 50 Grams or More of Methamphetamine with Intent to Distribute)**

**The Grand Jury Further Charges That:**

On or about May 7, 2024, in the Western District of New York, and elsewhere, the defendants, WINNIE TARU WOODS a/k/a Ru, SHARRON MCCULLOUGH a/k/a Black, and MARLON HOLT, JR. a/k/a Scooter a/k/a Professor, did knowingly and intentionally possess with intent to distribute 5 kilograms or more of a mixture and substance containing cocaine and 50 grams or more of methamphetamine, both Schedule II controlled substances.

**All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.**

### **FORFEITURE ALLEGATION**

#### **The Grand Jury Alleges That:**

Upon conviction of Count 1 and/or Count 2 of this Indictment, the defendants, WINNIE TARU WOODS a/k/a Ru, SHARRON MCCULLOUGH a/k/a Black, MARLON HOLT, JR. a/k/a Scooter a/k/a Professor, [REDACTED], GARY SUDESH GOSINE, SR., [REDACTED] and SHANNELL GOSINE, shall forfeit to the United States, all their right, title, and interest in any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of said violations and/or any and all property used, and intended to be used, in any manner or part, to commit or to facilitate the commission of said violations, including, but not limited to:

### **MONETARY AMOUNT**

An amount to be determined by the Court, which sum of money is equal to the total value of proceeds obtained as a result of such offenses or property used to facilitate the commission of such offenses. In the event that the sum is not available, then a forfeiture money judgment for the amount will be entered against that defendant.

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence,
- (b) has been transferred or sold to, or deposited with, a third person,
- (c) has been placed beyond the jurisdiction of the Court,
- (d) has been substantially diminished in value, or
- (e) has been commingled with other property which cannot be divided without difficulty,



the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

**All pursuant to Title 21, United States Code, Sections 853(a)(1), 853(a)(2), and 853(p).**

DATED: Buffalo, New York, February 20, 2025.

JOEL LOUIS VIOLANTI  
Acting United States Attorney

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A TRUE BILL:

S/FOREPERSON  
FOREPERSON